

IN THE UNITED STATES BANKRUPTCY COURT FOR THE
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re:)	Chapter 7
)	Bankruptcy No. 14-13193
TREND SOUND PROMOTER AMG CORP.,)	
)	
Debtor(s).)	
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BANKRUPTCY ESTATE OF TREND)	Adversary No. 14-01248
SOUND PROMOTER AMG CORP.,)	
by and through Nancy James, Bankruptcy)	
Trustee,)	
)	
Plaintiff,)	
)	
v.)	
)	
VOLODIMYR PIGIDA and JANE DOE)	
PIGIDA, husband and wife, and the marital)	
community comprised thereof, individually)	STIPULATION AMENDING
and as trustee of the Lakeshore Enterprises)	STIPULATION FOR
Trust; and MARINA BONDARENKO and)	PROTECTIVE ORDER
JOHN DOE BONDARENKO, wife and)	
husband, and the marital community)	
comprised thereof, individually and as trustee)	
of the Lakeshore Enterprises Trust, and)	
SOUNDT STUDIOS LLC, a Washington)	
limited liability company,)	
)	
Defendants.)	
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COME NOW the plaintiff, the Bankruptcy Estate of Trend Sound Promoter AMG Corp., by and through the duly appointed trustee, Nancy James, through special counsel, The Rigby Law Firm, and James Rigby, and the defendants, through counsel, MDK Law, and James P. Ware, and file this Stipulation Amending Stipulation for Protective Order.

1 On December 29, 2014, the parties filed a Stipulation for Protective Order (Docket No. 19).
2 An Agreed Order Approving Stipulation for Protective Order was entered by the court on January
3 5, 2015 (Docket No. 22).

4 The parties wish to amend paragraph 2 of the Stipulation for Protective Order as follows:
5 expanding the material included as confidential to include “personal identifiers on the website,
6 including but not limited to names, addresses, passwords, pass codes, tax numbers, account names
7 and account numbers.”

8 WHEREFORE, the parties pray for a Stipulated Order Amending Agreed Order Approving
9 Stipulated Protective Order reflecting amended paragraph two referenced above.

10 DATED this 6th day of March, 2015.

11 THE RIGBY LAW FIRM

12
13 */S/ James Rigby*

14 _____
James Rigby, WSBA #9658
Special Counsel for Trustee

15 DATED this 6th day of March, 2015.

16 MDK LAW

17
18 */S/ James P. Ware*

19 _____
James P. Ware, WSBA #36799
Attorneys for Defendants.